

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IVELISSE SANTANA,

Plaintiff,

vs.

CAVALRY PORTFOLIO SERVICES, LLC,

Defendant.

Civil Action No. 1:19-cv-03773-PAE

PLEASE TAKE NOTICE, that Defendant, Cavalry Portfolio Services, LLC (“Defendant”), will apply to the United States District Court for the Southern District of New York, before the Honorable Paul A. Engelmayer, United States District Judge, at the United States Courthouse located at 40 Foley Square, New York, NY 10007, for an Order granting Defendant’s Motion to Dismiss under Fed. R. Civ. P. 12, and granting such other and further relief as the Court may deem just and proper. In support of this motion, Defendant will rely upon the annexed Memorandum of Law in Support.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Rules, any opposing memorandum shall be served within fourteen days after service of to this Motion.

PLEASE TAKE FURTHER NOTICE that Defendant shall file its Reply in Support of this Motion within seven days after service of the answering papers.

PLEASE TAKE FURTHER NOTICE that no oral argument has been scheduled yet.

Defendant respectfully requests that the Court enter the proposed order dismissing all claims with prejudice and for such other relief as the Court deems appropriate.

Respectfully Submitted,

MAURICE WUTSCHER, LLP

/s/ Brady J. Hermann.

Brady J. Hermann, Esq.

Donald S. Maurice, Jr., Esq.

Maurice Wutscher, LLP

3 Allied Drive, Suite 303

Dedham, MA 02026

(617) 861-6035

bhermann@mauricewutscher.com

COUNSEL FOR CAVALRY PORTFOLIO
SERVICES, LLC.

Dated: July 24, 2019

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Cavalry Portfolio Services, LLC's Motion to Dismiss was served on all parties of record via the Court's ECF filing system on this date.

/s/ Brady J. Hermann, Esq.

Brady J. Hermann, Esq.

Date: July 24, 2019